

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

UNITED STATES OF AMERICA)	No. 2:20-cr-00094-MRH
)	
)	
v.)	
)	
)	
)	
JUSTIN SEAN JOHNSON)	
)	

**MOTION FOR EXTENSION OF TIME FOR ADMINISTRATIVE RESOLUTION OF
DRAFT PRESENTENCE INVESTIGATION REPORT**

AND NOW, comes the Defendant, Justin Sean Johnson, by and through his attorney, Nicola Henry-Taylor, Esquire, and respectfully moves this Honorable Court for an extension of time for the Administrative Resolution of Mr. Johnson's Draft Presentence Investigation Report and in support thereof avers as follows:

1. Counsel was appointed to represent Justin Sean Johnson in the above-referenced docket on June 25, 2020.
2. On May 20, 2021, a Change of Plea Hearing was held, and a guilty plea was entered for Mr. Johnson.
3. This Honorable Court has scheduled a sentencing hearing for September 22, 2021.
4. On August 10, 2021, Mr. Johnson's Draft Presentence Investigation Report was disclosed to Counsel. The Administrative Resolution deadline was scheduled for August 17, 2021.
5. Due to scheduling conflicts, Counsel will be unable to visit the Butler County Jail to review the Draft Presentence Investigation Report with Mr. Johnson before the August 17, 2021 Administrative Resolution deadline.

6. Counsel seeks a twenty-one (21) day extension of time to meet the Administrative Resolution Deadline in order to consult with Mr. Johnson regarding his Draft Presentence Investigation Report. The time requested is necessary to serve the interest of justice by allowing Counsel to prepare for Mr. Johnson's Sentencing Hearing.
7. AUSA Gregory Melucci and Probation Officer Erin Stewart have consented to Defendant's Motion for Extension of Time via e-mail.
8. If this Honorable Court grants this extension of time, Counsel kindly requests that all corresponding presentence deadlines be extended as well.

WHEREFORE, the Defendant, Justin Sean Johnson, respectfully requests this Honorable Court to extend the time for Administrative Resolution of Defendant's Draft Presentence Investigation Report for twenty-one (21) days or until a time period deemed appropriate by the Court, for the reasons stated herein.

Respectfully submitted:

August 13, 2021
Date

/s/ Nicola Henry-Taylor
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